

**Robbins Geller
Rudman & Dowd LLP**

Boca Raton
Chicago
Manhattan

Melville
Nashville
Philadelphia

San Diego
San Francisco
Washington, D.C.

David A. Rosenfeld
drosenfeld@rgrdlaw.com

June 15, 2021

VIA ECF

Hon. Naomi Reice Buchwald
Daniel Patrick Moynihan U.S. Courthouse
U.S. District Court, Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *City of St. Clair Shores Police and Fire Retirement System v. Credit Suisse Group*
AG, No. 1:21-cv-3385-NRB (S.D.N.Y.)

Dear Judge Buchwald:

My firm has been retained to file a motion in the above-referenced action pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA") for appointment as lead plaintiff and for approval of selection of counsel. Pursuant to the PSLRA, this motion must be made by any class member who wishes to seek appointment as a lead plaintiff (regardless of whether they filed a complaint), no later than 60 days following the publication of the notice that was issued advising investors of the pendency of the action. *See* 15 U.S.C. §78u-4(a)(3)(A)-(B). Notice in this matter was issued on April 16, 2021; accordingly, motions must be filed no later than today.

Your Honor's Individual Practices require a pre-motion conference before making any motion. We respectfully request leave from complying with this practice because the motion is statutorily required to be filed by today and we are unaware of which other class members, if any, will also seek appointment as lead plaintiff. Indeed, until the e-filing deadline expires at midnight tonight, there is no way to know who will seek appointment as lead plaintiff, and without all necessary parties at a pre-motion conference, there is no practicable way to effectively narrow or resolve the relief sought by our motion at this time.

Accordingly, we respectfully request that Your Honor's pre-motion conference requirement be waived in this narrow instance.

Respectfully submitted,



DAVID A. ROSENFELD

CC: All counsel of record (via ECF)